

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
) **Cause No. 4:16CR00099JAR/SPM**
v.)
)
 MATTHEW SILIES,)
)
 Defendant.)

MOTION TO MODIFY CONDITIONS OF RELEASE

Comes now, the Defendant, by counsel, and requests that his conditions of release be amended to allow computer access on campus at St. Louis Community College – Forest Park for the purpose of classwork or exams. In support the defendant states the following:

1. Defendant is charged with one count of Possession of Child Pornography in violation of Title 18, United States Code, Section 2252A(a)(5)(B).
2. Defendant voluntarily surrendered to authorities on March 04, 2016 and was released on personal recognizance subject to the Court’s conditions of release.
3. As a condition of release the Court ordered that Defendant have no internet or computer access at any location.
4. Defendant is currently enrolled part-time in the Culinary Arts program at St. Louis Community College – Forest Park. As part of his course work Defendant is required to utilize a computer on campus, including the use of computers to take exams. In particular, the Defendant is currently enrolled in CUL 101, Safety and Sanitation, which has a two-hour computer exam scheduled for next Thursday April 14, 2016.

5. Defendant has discussed this request with his Pretrial Services Officer and was advised that he would need approval from the Court.

6. Counsel submits that by allowing the Defendant to utilize a computer on-campus for course work and exams he will be able to continue his education, obtain necessary certification, and seek meaningful employment while on pretrial release.

WHEREFORE, the Defendant respectfully requests his pretrial release be modified as requested herein.

FRANK, JUENGEL & RADEFELD,
ATTORNEYS AT LAW, P.C.

By: /s/Daniel A. Juengel
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CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Colleen Lang
Asst. United States Attorney
111 South Tenth Street, 20th Floor
St. Louis, Missouri, 63102

/s/Daniel A. Juengel
DANIEL A. JUENGEL